

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
LUBBOCK DIVISION**

NATIONAL HORSEMEN'S BENEVOLENT AND PROTECTIVE ASSOCIATION, ARIZONA HORSEMEN'S BENEVOLENT AND PROTECTIVE ASSOCIATION, ARKANSAS HORSEMEN'S BENEVOLENT AND PROTECTIVE ASSOCIATION, INDIANA HORSEMEN'S BENEVOLENT AND PROTECTIVE ASSOCIATION, ILLINOIS HORSEMEN'S BENEVOLENT AND PROTECTIVE ASSOCIATION, LOUISIANA HORSEMEN'S BENEVOLENT AND PROTECTIVE ASSOCIATION, MOUNTAINEER PARK HORSEMEN'S BENEVOLENT AND PROTECTIVE ASSOCIATION, NEBRASKA HORSEMEN'S BENEVOLENT AND PROTECTIVE ASSOCIATION, OKLAHOMA HORSEMEN'S BENEVOLENT AND PROTECTIVE ASSOCIATION, OREGON HORSEMEN'S BENEVOLENT AND PROTECTIVE ASSOCIATION, PENNSYLVANIA HORSEMEN'S BENEVOLENT AND PROTECTIVE ASSOCIATION, TAMPA BAY HORSEMEN'S BENEVOLENT AND PROTECTIVE ASSOCIATION, and WASHINGTON HORSEMEN'S BENEVOLENT AND PROTECTIVE ASSOCIATION,

Plaintiffs,

v.

JERRY BLACK; KATRINA ADAMS; LEONARD COLEMAN, JR.; NANCY COX; JOSEPH DUNFORD; FRANK KEATING; KENNETH SCHANZER; the HORSERACING INTEGRITY AND SAFETY AUTHORITY, INC.; the FEDERAL TRADE COMMISSION; REBECCA KELLY SLAUGHTER, in her official capacity as Acting Chair of the Federal Trade Commission; ROHIT CHOPRA, in his official capacity as Commissioner of the Federal Trade Commission; NOAH JOSHUA PHILLIPS, in his official capacity as Commissioner of the Federal Trade Commission; and CHRISTINE S. WILSON, in her official capacity as Commissioner of the Federal Trade Commission,

Defendants.

No. 5:21-cv-00071-H

**MOTION TO
SUBSTITUTE COUNSEL**

Pursuant to Local Rule 83.12(d), Liberty Justice Center, attorneys for Plaintiffs, moves to substitute Daniel Suhr for Brian Kelsey as counsel. Liberty Justice Center attorneys Reilly Stephens and Jeffrey Jennings will remain as additional counsel, and Fernando Bustos will remain as local counsel. The substitution of Mr. Suhr for Mr. Kelsey is due to a reshuffling of case responsibilities within the firm and will not prejudice any party or delay resolution of this case.

Dated: January 14, 2022

Respectfully Submitted,

/s/ Daniel Suhr

Daniel Suhr, *Admitted Pro Hac Vice*
Reilly Stephens, *Admitted Pro Hac Vice*
Jeffrey D. Jennings, *Admitted Pro Hac Vice*
Liberty Justice Center
141 W. Jackson Blvd., Ste. 1065
Chicago, Illinois 60604
Telephone (312) 637-2280
dushr@libertyjusticecenter.org
rstephens@libertyjusticecenter.org
jjennings@libertyjusticecenter.org

and

Fernando M. Bustos
(Texas Bar. No. 24001819)
Bustos Law Firm, P.C.
1001 Main Street, Suite 501
Lubbock, Texas 79408
Telephone (806) 780-3976
fbustos@bustoslafirm.com
Attorneys for Plaintiffs